

This proposal shares a similarity with the NCVEC in that it creates an unnecessary and unsupportable new entry-level license class. However, it is somewhat closer to the mark than the NCVEC proposal.

It should be noted that the ARRL did not formally poll its members prior to formulating and submitting this proposal. Therefore, the ARRL is speaking only for itself and not for its members.

Rather than comment on specific paragraphs, I will comment only on certain aspects of the proposal with which I strongly agree or disagree.

Creation of a new entry-level license:

There is nothing wrong with the current Technician class as an entry-level license. Many people acquire a technician-class license simply to use VHF and UHF and remain Technicians for life. The Technician license is a valid and useful entry-level license that satisfies certain specific needs.

An abbreviated entry-level examination is unnecessary. The Element 2 examination is not an impediment to achieving an amateur license; I have taught Fifth graders who have gained their licenses. An entry-level examination should require familiarity with FCC rules, basic operating procedures, international treaty requirements (because even at UHF, licensees will be allowed to communicate internationally in the satellite sub-bands) and should especially cover basic concepts of station setup, electrical safety, and RF safety. The current Element 2 question pool adequately covers this material, and the current 35-question format includes questions on each element.

The ARRL's proposed "Novice" license (unfortunate, confusing nomenclature) contains some similar power restrictions to the NCVEC proposal. However, no restrictions will be required if the Technician class is left as-is. Technician applicants are adequately tested on electrical and RF Safety concepts. If these limits are being proposed simply because the new abbreviated examination will ignore considerations of electrical and RF safety, then the proposed limits are an especially bad idea. Transceivers are commonly available that exceed the ARRL's proposed power limits; even FM mobile radios are generally available today in the 55 to 75 watt class. Although their power can be reduced, a licensee who has not been required to learn basic safety concepts will not know why they should keep power below these limits. In addition, commonly available "gain" antennas can increase the ERP of these stations to well over the levels at which near-field radiation safety is a concern, yet there is no discussion of ERP in the proposed limitations. In fact, under a simplified examination, there is no guarantee that licensees will even understand what ERP means.

I do not support HF access for the entry-level license class. There is simply no need for it. Many applicants will only want VHF/UHF access. If Element 1 is eliminated as a requirement for the General Class license (a concept which I support) then Technicians only need to pass Element 3 for access to HF. Element 3 covers more material specific to HF operation and is an ideal match between proficiency and privilege. It is not so difficult as to be an impediment; rather, it ensures that new HF operators will understand a little about HF.

Elimination of Morse Testing for General Class license:

I support this proposal. There is no longer an international requirement for it. However, I do not support automatic merger of Technician and Technician

Plus licensees into the General class. I will discuss specific alternatives below.

Retention of Morse Testing for the Extra Class license:

The Extra Class serves as the reservoir of knowledge from which less-experienced amateurs are "mentored. This reservoir of knowledge will be partially empty without basic Morse Code proficiency. I support the ARRL proposal on this matter.

Elimination of "Grandfathering" and realignment of old license classes:

Existing Novice Class licensees should be given lifetime Element 1 credit, and should be given until the expiration date of their current license to either upgrade to General by passing Element 3 or be downgraded to Technician.

Existing Technician Plus licensees should be given lifetime Element 1 credit, and should remain in the Technician Class unless and until they pass Element 3. Existing Technician licensees should remain Technicians. The Element 2 examination that they passed did not adequately cover principles of operation on HF, which is sufficiently different from VHF/UHF that it requires different knowledge.

Existing Advanced-class licensees should be upgraded to Extra as proposed by the ARRL. The technical proficiency examination they passed covers as much or more as the current Extra Class examination and they have already passed a Morse proficiency examination more difficult than the current Extra-class exam.

Therefore, the Novice, Technician Plus, and Advanced classes will all be retired, except for the lifetime Element 1 credit discussed above

In conclusion, there is much to recommend about the ARRL proposal; however, certain portions of it may need to be deleted or modified before it is acceptable. It may fall on the FCC to make the minor changes required to develop a sensible restructuring proposal from the ARRL's model. At minimum, and possibly at maximum, a restructuring should include the following:

- Retention of a VHF/UHF-only license as an entry level or to provide access to VHF/UHF spectrum to amateurs who do not require more. Examinations for such a license do not need to be simplified; they should adequately emphasize familiarity with the rules, basic operating principles, station setup, basic electrical principles, and above all, radiation and electrical safety. This differs significantly from the ARRL proposal. There is nothing wrong with the current Technician class; it adequately serves a need.

- Retention of the Element 3 examination as a requirement to operate in the HF portion of the spectrum. This differs somewhat from the ARRL proposal; their proposal allows access to portions of the HF spectrum to entry-level licensees who will not have been required to demonstrate even cursory knowledge of how HF works.

- Elimination of unused license classes (Technician Plus, Novice, Advanced) by retention of credit for elements passed and upgrading or downgrading licensees to existing license classes as appropriate. The ARRL proposal is close in this area, but their idea for a new entry-level license means that something must be done with Technicians. If the Technician-class license is retained for the reasons I discussed above, then Technicians may stay Technicians.

- Retention of Element 1 testing to achieve the Extra Class license, the highest-level license in the Amateur Service. The ARRL proposal accomplishes this.